

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.
SECURITIES LITIGATION

This Document Relates to:

ALL ACTIONS.

Case No. 12-cv-01341-G

**JOINT STIPULATION AND MOTION TO STAY OUTSTANDING MOTIONS
AND DEADLINES AS TO DEFENDANT TOM L. WARD AND TO SET DATE
FOR PRELIMINARY SETTLEMENT APPROVAL MOTION**

Defendant Tom L. Ward (“Mr. Ward”) and Lead Plaintiffs Laborers Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis, and Angelica Galkin (“Lead Plaintiffs”), by and through their undersigned counsel, submit the following stipulation and jointly move the Court to stay all pending motions and outstanding case deadlines applicable to Mr. Ward, and to set a date for Lead Plaintiffs to file a motion for preliminary approval of a proposed settlement agreement between Mr. Ward and Lead Plaintiffs (together, the “Parties”).

STIPULATION AND JOINT MOTION

WHEREAS, on December 21, 2016, Lead Plaintiffs filed a Third Consolidated Amended Complaint for Violations of the Federal Securities Laws (ECF No. 225);

WHEREAS, on February 2, 2018, Lead Plaintiffs filed a Motion for Class Certification (ECF No. 268);

WHEREAS, on September 30, 2019, the Court entered an Order granting Lead Plaintiffs’ Motion for Class Certification and certifying a class under Federal Rule of Civil Procedure 23(a) and (b)(3) (ECF No. 453);

WHEREAS, pending before the Court are numerous Outstanding Motions, as defined in the Court’s Twelfth Amended Scheduling Order (ECF No. 531), including, *inter alia*, Mr. Ward’s Motion for Summary Judgment (ECF No. 489); as well as Defendants’ Motion for Reconsideration Under Rule 54(b) (ECF No. 483) and multiple *Daubert* motions to exclude expert testimony (ECF Nos. 475, 487).

WHEREAS, the Parties participated in an in-person mediation with Judge Layn R. Phillips on December 13, 2019, and continued settlement discussions thereafter;

WHEREAS, the Parties have reached an agreement in principle to settle all claims asserted against Mr. Ward, subject to, among other items, definitive documentation and the Court's approval;

WHEREAS, the Parties are continuing to formalize the final terms of their settlement;

NOW THEREFORE, MR. WARD AND LEAD PLAINTIFFS HEREBY STIPULATE AND MOVE THE COURT TO ISSUE THE FOLLOWING ORDER:

1. Mr. Ward's motion for summary judgment, and all other Outstanding Motions and pending deadlines with respect to Mr. Ward, are stayed;

2. Lead Plaintiffs will move for preliminary approval of the settlement on or before September 1, 2021 or, if unable to do so by that date, Lead Plaintiffs will file a further stipulation requesting additional time to seek preliminary settlement approval.

IT IS SO STIPULATED.

Dated: June 7, 2021

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